Comments on 779 DOP, 10/6/97
Chris Gilbreath, CDPHE

COMMENT

1.) p. 3,51, Section 5.3: Utilizing the 25 µ/ft2 housecleaning action limit for beryllium (which was developed in the 60's) may not be appropriate. The DOP or supplemental documents must elaborate and clearly identify how the value was derived and its applicability. Also, what does the "zero" added beryllium standard mean?

RESPONSE

Take it away Mark!!!!!

COMMENT

2.) p. 35, Section 3.2: Documents to be developed include demolition plans, lead abatement plans and other significant plans. A section should be added (somewhere in the DOP) to include the schedule for development of these and other documents, the submittal dates to the LRA and whether or not they require LRA approval (e.g., the demolition should be submitted to CDPHE for approval at least 30 days prior to implementation).

RESPONSE

Those documents that require LRA approval are identified in the RFCA; specific to the 779 Cluster, they are the IM/IRA documentation and the RLCR. Support documentation subject to LRA approval includes SAPs, Technical Memorandas, Closeout Reports, and Treatability Study Reports. Any document necessary to execute the accelerated action such as the HASP, AHAs and Field Implementation Plans (FIP) are not subject to either agency or public review.

The project places significant value on document review and comment provided by CDPHE. Documents requested by CDPHE will be provided and CDPHE will be included in the review cycle for the documents requested in this comment documentation.

Planning documents will be identified in the schedule and those requiring LRA approval will be specifically identified in the DOP.

COMMENT

3.) p. 39, Section 3.2.2: Engineering Package/IWCP Development similar to previous comment, identify the timeframe for development of the documents and LRA review

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and approval (if necessary). Further discussion may be warranted to resolve which of these documents require LRA approval.

RESPONSE

The timeframes for development of the engineering packages and IWCPs are identified in the schedule located in Attachment 1 of the 779 Cluster DOP. CDPHE will be provided copies of the IWCPs for review and comment.

COMMENT

4.) p. 40, Section 3.2.3: Why was piping and equipment left to be drained and LO/TO by decommissioning personnel? I don't necessarily disagree with the approach but it does contradict with the activities considered to be part of deactivation in the draft DPP (9/97).

RESPONSE

Piping and dismantlement of equipment left to be drained will be performed as both a deactivation and decommissioning task throughout the cleanup process at RFETS. The project does not see this as a contradiction to the draft DPP. Indeed disabling systems, such as draining lines and tanks, is identified specifically as a deactivation activity in the DPP but stripout and removal of gloveboxes, and tank/process equipment, identified in the DPP as decommissioning activities, will also result in the draining of piping and dismantlement of equipment. Accessibility of piping or equipment is one factor that way determine whether an activity is performed during deactivation or decommissioning; engineering approach, dismantlement approach, cost, and schedule may also effect when an activity is performed.

COMMENT

5.) p.42, Section 4.1.2: What is the status of the RLCR? Recommend including submittal of RLCR with the DOP to the LRA.

RESPONSE

A draft RLCR is undergoing project review. The document is scheduled for transmittal to K-H on Nov. 3, 1997 and will then be transmitted through DOE to CDPHE.

COMMENT

6.) p.44, Section 4.2, #2: Clearly define what agency/group is responsible in the event a chemical is found. Also, the DOP should clearly state that these chemicals can only be handled by the designated agency/groups technical expert.

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RESPONSE

In the event that a chemical is found within the 779 Cluster , the Chemical Control Administrator will be contacted. The chemical will then be addressed in compliance with the Compliance Order on Consent, 97-08-21-02, regarding waste chemicals. The SSOC Chemical Control Administrator assigned to the 779 Cluster is Fernando Payan.

Section 4.2 has been enhanced to include this information.

COMMENT

7.) p. 44,46, 47, Sections 4.2, #4, 4,6 and 5.0: Lead characterization/sampling/disposal- has the Site developed an EPA or CDPHE approved procedure or computer model to determine leachability. I'm unaware of an approved procedure. Define when TCLP is necessary. If, as identified in ζ4.6, it is assumed that all painted surfaces are lead bearing unless proven otherwise, development of an acceptable procedure or model to determine leachability is vital. Without this approved procedure/model, disposal costs may become very significant.

RESPONSE

The last sentence on page 44, Section 4.2 has been revised to state "A Sampling and Analysis Plan (SAP) that addresses lead characterization will be developed and submitted to the LRA for review and approval. This plan will identify the 779 Cluster approach to evaluating lead paint coated materials . Representative sampling will be performed to characterize and compliantly dispose of lead paint contaminated debris.

In accordance with the RFCA Implementation Guidance Document, August 1997, the SAP will be prepared in parallel with the DOP and comment resolution period. The SAP will identify the sampling methodology.

Section 4.6, page 46, was replaced with the following:
Lead shielding and lead based paint are present in the 779 Cluster facilities. A SAP will be developed and submitted the LRA for comment and approval. This plan will provide detail on how sampling will be performed on painted materials (walls, concrete, door jams) within the facilities. The results of this sampling will determine the regulatory requirements for management and disposal of these materials.

The following information was added to Section 5.0, page 47:
In accordance with the 779 Cluster Waste Management Plan, any remediation waste that is characterized as D008 (i.e., lead bricks or sheeting, lead-based painted debris, and lead paint chips) will be managed in accordance with all hazardous remediation waste related ARARs.

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COMMENT

8.) p. 47, Section 5.1: How real is the potential to remove a portion of the building prior to final survey? When would this potential become likely?

RESPONSE

No portion of Building 779, or the 779 Cluster for that matter, will be removed prior to the performance of a survey, commensurate with whether the portion to be removed will be characterized to ensure worker safety, or to meet radiological contamination cleanup criteria or waste characterization requirements. To be more specific, a section of a wall may need to be removed in order to remove a piece of equipment. Generally, this section of wall would not be surveyed to MARRSIM criteria but would be surveyed as part of the waste characterization process.

A phased approach for final survey and demolition will be performed. As decommissioning of portion of a building, or a support facility is completed, and the area/facility is isolated from Cluster related utilities, a final survey, in accordance with MARRSIM, will be performed. Upon successful completion of the final survey, demolition will then be performed.

The sentence in question has been reworded to provide additional clarification.

COMMENT

9.) p.51, Section 5.6: Recommend adding a section to address lead based paint release criteria and possible hazardous waste.

RESPONSE

The following information was added to Section 5.6:
TRU, and TRM remediation wastes containing lead, will be packaged for ultimate disposal at WIPP. Remediation hazardous waste or mixed hazardous remediation waste will be disposed of at an approved TSD facility. Hazardous remediation waste characterized as EPA hazardous waste number D008, or mixed hazardous remediation waste will be disposed of at an approved TSD facility. Lead paint contaminated debris that is characterized as industrial waste will be released to either an approved LLW TSD facility or sanitary landfill based on radiological evaluation. In addition, all applicable OSHA requirements regarding worker protection during lead abatement (i.e., removal of lead contaminated paint debris) will adhered to.

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COMMENT

10.) p.54, Section 7.3.1: Timeframe for development of contractor's training matrix should be included. Is the matrix approved by DOE/K-H as part of the issuance of a contract?

RESPONSE

The training matrix for personnel performing work has been completed and is contained in 779 Cluster HASP. The HASP is reviewed and approved by K-H.

COMMENT

11.) p. 67, Section 8.9: In light of previous contamination inside the building as well as outside (5 IHSSs), demolition of this cluster is significant. As a result, the LRA must review and approve the demolition and monitoring plan prior to implementation.

RESPONSE

Those documents for which LRA approval is required, in accordance with RFCA, are identified (reference RESPONSE 2).

Air emissions associated with radiological contamination will be contained within the facilities during decommissioning through the existing plenum systems and as these systems are disabled, portable air filtration equipment will be used. Demolition will not be performed on any facility within the 779 Cluster until final surveys have been performed. The final survey is performed to ensure that radiological cleanup criteria are met. Once the cleanup criteria are met, there should be no significant contamination left in the facility. Monitoring of air, water, and ground water during the demolition phase of the project will be performed in accordance with the provisions established in the IA IM/IRA. These provisions are incorporated through reference in the 779 DOP (Section 9, Regulatory and Environmental Considerations).

Much of the area around the 779 Cluster has been paved; for this reason, the project doe not believe that there will be significant disturbance of the IHSSs . All appropriate precautions will be taken to ensure minimal disturbance of the IHSSs.

COMMENT

12.) p.67, Section 8.10: Has all of the idle equipment been dispositioned? If so, this section should be removed.

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RESPONSE

All idle equipment that potentially contains hazardous constituents will be drained during deactivation. To date, one piece of idle equipment still requires draining. This piece of equipment will addressed during the performance of fall deactivation activities.

COMMENT

13.) p.69, Table 8-1: Room classification should include whether a room is considered a Class 1,2,3 or non-impacted area.

RESPONSE

The rooms will be evaluated regarding their Class 1, 2, 3 or non-impacted status after in-process surveys are performed and a Historical Site Assessment has been completed. A Closeout Survey Plan is then generated and the rooms will be classified based on the Historical Site Assessment.

COMMENT

14.) p. 75, Section 9.1: Reword the sentence regarding P.E. certification. The GB failed to meet the closure performance std. - the P.E.'s "refusal" to certify clean closure is misleading. Also, what is the schedule for submitting the closure description document for these units?

RESPONSE

The sentence has been reworded.

The closure description document information has been integrated into Section 9 of the DOP; the schedule for closure of the Building 779 RCRA units has been integrated into Attachment 1, 779 Cluster Schedule.

COMMENT

15.) p.78, Section 9.2.2: Waste storage - weekly inspections for containers, daily inspections required for tanks.

RESPONSE

Inspections of containers will be performed on a weekly basis. Presently, there are no hazardous remediation waste tanks within the 779 Cluster. In the event that any tanks are used to store hazardous remediation waste, the need for more frequent inspections, such as on a daily basis, will be evaluated.

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The language in the DOP, Section 9.2.2, Waste Storage, provides for more frequent inspections with respect to containers and tanks as necessary.
COMMENT

16.) p.91: The closure plan in the Site's RCRA permit should also be considered applicable.

RESPONSE

This information has been integrated.